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Attorneys for Lehman Brothers Holdings Inc. and  
Certain of Its Affiliates

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re	: Chapter 11 Case No.
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	: 08-13555 (JMP)
Debtors.	: (Jointly Administered)
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**CERTIFICATE OF NO OBJECTION UNDER 28 U.S.C. § 1746  
REGARDING LEHMAN BROTHERS HOLDINGS INC.'S MOTION PURSUANT  
TO SECTION 8.4 OF THE MODIFIED THIRD AMENDED JOINT CHAPTER 11  
PLAN OF LEHMAN BROTHERS HOLDINGS INC. AND ITS AFFILIATED  
DEBTORS TO ESTIMATE THE AMOUNT OF PROOF OF CLAIM NUMBER 30598  
FILED BY US AIRWAYS, INC. FOR PURPOSES OF ESTABLISHING RESERVES**

TO THE HONORABLE JAMES M. PECK  
UNITED STATES BANKRUPTCY JUDGE:

Pursuant to 28 U.S.C. § 1746, and in accordance with this Court's case management procedures set forth in the Amended Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 1015(c) and 9007 Implementing Certain Notice and Case Management Procedures (ECF No. 9635) (the "Second Amended Case Management Order"), the undersigned hereby certifies as follows:

1. On January 15, 2013, Lehman Brothers Holdings Inc. (the "Plan Administrator"), as Plan Administrator under the *Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors* (the "Plan"), filed with this

*Court a Motion Pursuant To Section 8.4 of The Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. And Its Affiliated Debtors To Estimate The Amount of Proof of Claim Number 30598 Filed By US Airways, Inc. For Purposes of Establishing Reserves* (the “Motion”) (ECF No. 33922).

2. In accordance with the Second Amended Case Management Order, January 23, 2013 at 4:00 p.m. (Prevailing Eastern Time) was established as the deadline for parties to object or file responses to the Motion (the “Objection Deadline”). The Second Amended Case Management Order provides that pleadings may be granted without a hearing, provided that no objections have been filed prior to the Objection Deadline and the attorney for the entity who filed the pleading complies with the relevant procedural and notice requirements.

3. The Objection Deadline has now passed and, to the best of my knowledge, no objection or other responsive pleading to the Motion has been filed with the Court on the docket of the above-referenced cases in accordance with the procedures set forth in the Second Amended Case Management Order, nor has any objection or other responsive pleading with respect to the Motion been served on the Plan Administrator’s counsel.

4. Accordingly, for the reasons set forth in the Motion, the Plan Administrator respectfully request that the proposed Order annexed hereto as Exhibit A and unmodified since the filing of the Motion, be entered in accordance with the procedures described in the Second Amended Case Management Order.

5. I declare that the foregoing is true and correct.

Dated: February 12, 2013  
New York, New York

/s/ Jacqueline Marcus  
Jacqueline Marcus

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**EXHIBIT A**  
**(Proposed Order – ECF No. 33922)**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
: **Chapter 11 Case No.**  
: **08-13555 (JMP)**  
: **(Jointly Administered)**  
: **Debtors.**  
: **LEHMAN BROTHERS HOLDINGS INC., et al.,**  
: **In re**  
-----X

**ORDER PURSUANT TO SECTION 8.4  
OF THE MODIFIED THIRD AMENDED JOINT CHAPTER 11 PLAN  
OF LEHMAN BROTHERS HOLDINGS INC. AND ITS AFFILIATED  
DEBTORS TO ESTIMATE THE AMOUNT OF PROOF OF CLAIM NUMBER 30598  
FILED BY US AIRWAYS, INC. FOR PURPOSES OF ESTABLISHING RESERVES**

Upon the motion (the “Motion”) dated January 15, 2013, of Lehman Brothers Holdings Inc. (“LBHI” and the “Plan Administrator”), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors (the “Plan”), for approval, pursuant to sections 8.4 of the Plan, and sections 105(a), 502(c), and 1142(b) of title 11 of the United States Code (the “Bankruptcy Code”), to estimate the amount of the US Airways Claim<sup>1</sup> for the purposes of establishing reserves in connection with the Plan, as more fully described in the Motion; and the Court having jurisdiction to consider the Motion and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order of Reference M-431, dated January 31, 2012 (Preska, C.J.); and consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided to (i) the United States Trustee for Region 2; (ii) the Securities and Exchange Commission; (iii) the

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<sup>1</sup> Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Motion.

Internal Revenue Service; (iv) the United States Attorney for the Southern District of New York; (v) US Airways; and (vi) all other parties entitled to notice in accordance with the procedures set forth in the second amended order entered on June 17, 2010 governing case management and administrative procedures for these cases [ECF No. 9635]; and it appearing that no other or further notice need be provided; and a hearing having been held to consider the relief requested in the Motion; and the Court having found and determined that the relief sought in the Motion is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the Motion is granted as provided herein; and it is further

ORDERED that the US Airways Claim is hereby estimated in the amount of \$91.2 million in LBHI Class 7 solely for purposes of determining the reserves to be set for the US Airways Claim under the Plan; and it is further

ORDERED that the estimation of the US Airways Claim is not deemed to determine or affect in any respect the allowed amount of the US Airways Claim for any purpose other than establishing the reserve amount for the US Airways Claim under the Plan; and it is further

ORDERED that the estimation of the US Airways Claim is without prejudice to the rights of US Airways to assert that the allowed amount of the US Airways Claim should be greater than the Estimated Reserve Amount; and it is further

ORDERED that the estimation of the US Airways Claim is without prejudice to the rights defenses and objections of LBHI or the Plan Administrator (as defined in the Plan) to the merits, amount and priority of the US Airways Claim and that by estimating the US Airways

Claim, all rights of LBHI and the Plan Administrator with respect to the US Airways Claim are fully preserved; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: New York, New York  
\_\_\_\_\_, 2013

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Honorable James M. Peck  
United States Bankruptcy Judge

